

David H. Krieger, Esq.
NV Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 130
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com

Danny J. Horen, Esq.
NV Bar No. 13153
Kazerouni Law Group, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117
Telephone: (800) 400-6808x7
Facsimile: (800) 520-5523
danny@kazlg.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTINE KOOPMAN

Plaintiff,

v.

**KOHL'S DEPARTMENT
STORES, INC.,**

Defendants.

Case No.: 2:15-cv-00462-MMD-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO
DISMISS**

[SECOND REQUEST]

Plaintiff, CHRISTINE KOOPMAN (“Plaintiff”), and Defendant, KOHL’S DEPARTMENT STORES, INC. (“Defendant”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant’s Motion to Dismiss. The current deadline is set for July 13, 2015.

1. Plaintiff’s Complaint was filed on March 12, 2015. [Dkt. No. 1]
2. Defendant filed its Motion to Dismiss [Dkt. No. 9] on June 12, 2015.
3. The parties are engaged in good faith settlement discussion. Plaintiff and Defendant have agreed to an extension of time of 30 days, up to and including August 12, 2015 for Plaintiff to respond to Defendant’s Motion To Dismiss.
4. This request is not made for purposes of delay, but rather to allow the parties to explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 30 days, up to and including August 12, 2015, for Plaintiff to respond to Defendant’s Motion to Dismiss.

DATED: July 10, 2015

PISANELLI BICE

/s/ Jordan Smith

Jordan Smith, Esq.
400 S. 7th St., Ste. 300
Las Vegas, NV 89101
JTS@pisanellibice.com
Attorneys for Defendant

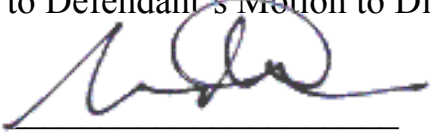
KAZEROUNI LAW GROUP, APC

/S/ DANNY J. HOREN

DANNY J. HOREN, ESQ
7854 W. Sahara Avenue
Las Vegas, NV 89117
danny@kazlg.com
Attorneys for Plaintiff

IT IS SO ORDERED:

Plaintiff shall have 30 days, up to and including August 12, 2015, to respond to Defendant's Motion to Dismiss.



UNITED STATES DISTRICT COURT JUDGE

DATED: July 13, 2015

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: July 10, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen
DANNY HOREN, ESQ.
ATTORNEY FOR PLAINTIFF